

1 KEKER & VAN NEST LLP  
ROBERT A. VAN NEST - #84065  
2 BRIAN L. FERRALL - #160847  
DAVID SILBERT - #173128  
3 MICHAEL S. KWUN - #198945  
633 Battery Street  
4 San Francisco, CA 94111-1809  
Telephone: (415) 391-5400  
5 Email: rvannest@kvn.com;  
bferrall@kvn.com; dsilbert@kvn.com;  
6 mkwun@kvn.com

SUSAN CREIGHTON, SBN 135528  
SCOTT A. SHER, SBN 190053  
WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
1700 K Street NW, Fifth Floor  
Washington, D.C., 20006-3817  
Telephone: (202) 973-8800  
Email: screighton@wsgr.com;  
ssher@wsgr.com

7  
8 JONATHAN M. JACOBSON, NY SBN 1350495  
CHUL PAK (*pro hac vice*)  
DAVID H. REICHENBERG (*pro hac vice*)  
9 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
10 1301 Avenue Of The Americas, 40th Floor  
New York, NY 10019-6022  
11 Telephone: (212) 999-5800  
Email: jjacobson@wsgr.com; cpak@wsgr.com;  
12 dreichenberg@wsgr.com

13 Attorneys for Defendant ARISTA NETWORKS, INC.

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN JOSE DIVISION

17 CISCO SYSTEMS, INC.,

18 Plaintiff,

19 v.

20 ARISTA NETWORKS, INC.,

21 Defendant.  
22

Case No. 5:14-cv-05344-BLF (NC)

**DECLARATION OF RYAN K. WONG IN  
SUPPORT OF DEFENDANT ARISTA  
NETWORKS, INC.'S ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS UNDER  
SEAL IN CONNECTION WITH ARISTA'S  
RESPONSE TO CISCO'S SUBMISSION  
RE PROTECTABLE ELEMENTS**

23 Judge: Hon. Beth Labson Freeman

24 Date Filed: December 5, 2014

25 Trial Date: November 21, 2016  
26  
27  
28

DECLARATION OF RYAN WONG IN SUPPORT OF DEFENDANT ARISTA NETWORKS, INC.'S  
ADMINISTRATIVE MOTION TO FILE UNDER SEAL ARISTA'S RESPONSE TO CISCO'S  
SUBMISSION RE PROTECTABLE ELEMENTS  
Case No. 5:14-cv-05344-BLF (NC)

1 I, RYAN K. WONG, declare and state as follows:

2 1. I am an attorney licensed to practice law in the State of California and admitted to  
3 practice before this Court. I am an associate at the law firm of Keker & Van Nest, LLP and  
4 counsel for Defendant Arista Networks, Inc. ("Arista") in the above-captioned action. I have  
5 personal knowledge of the facts stated herein and, if called as a witness, I could testify  
6 competently thereto.

7 2. I submit this declaration in support of Arista's Administrative Motion to File  
8 Under Seal Confidential Information and Documents Submitted with Arista's Response to  
9 Cisco's Submission re Protectable Elements.

10 3. As required by Civil L.R. 79-5(e), Arista is filing under seal documents and  
11 information previously designated as confidential or highly confidential by Cisco Systems, Inc.  
12 ("Cisco") and third parties Dell, Juniper Networks, and HP Enterprise. Arista is submitting these  
13 documents and portions of Arista's Response to Cisco's Submission re Protectable Elements  
14 under seal because they contain, discuss, or quote from deposition testimony and documents that  
15 Cisco and these third parties have designated as confidential or highly confidential under the  
16 Protective Order, as detailed in the chart below:

Document	Portions of Document to be Sealed	Parties Claiming Confidentiality
Arista's Response to Cisco's Submission re Protectable Elements	Highlighted Portions	Cisco, Dell, Juniper, HP
Exhibit 1 to the Declaration of John R. Black, Jr. ISO Arista's Response to Cisco's Submission re Protectable Elements	Entire Document	Cisco
Exhibit 7 to the Declaration of Ryan Wong ISO Arista's Response to Cisco's Submission re Protectable Elements (Excerpts from Deposition of Philip Kasten (Juniper 30(b)(6)))	Entire Document	Juniper Networks

Document	Portions of Document to be Sealed	Parties Claiming Confidentiality
Exhibit 8 to the Declaration of Ryan Wong ISO Arista's Response to Cisco's Submission re Protectable Elements (Excerpts from Deposition of Gavin Cato (Dell 30(b)(6)))	Entire Document	Dell
Exhibit 9 to the Declaration of Ryan Wong ISO Arista's Response to Cisco's Submission re Protectable Elements (Excerpts from Deposition of Balaji Venkatraman (HP 30(b)(6)))	Entire Document	HP Enterprise
Exhibit 11 to the Declaration of Ryan Wong ISO Arista's Response to Cisco's Submission re Protectable Elements (Excerpts from Deposition of Tong Liu)	Entire Document	Cisco
Exhibit 12 to the Declaration of Ryan Wong ISO Arista's Response to Cisco's Submission re Protectable Elements (Excerpts from September 16, 2016 Deposition of Kirk Loughheed)	Entire Document	Cisco

4. Arista expects that Cisco and the third parties will file supporting declarations pursuant to Civil L.R. 79-5(e)(1) if they seek to keep under seal any of the information identified above.

Executed October 18, 2016, at San Francisco, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
\_\_\_\_\_  
RYAN WONG